

GOLDSMITH & GUYMON, P.C.

Dara J. Goldsmith, Esq.

Nevada Bar No. 4270

dgoldsmith@goldguylaw.com

John L. Waite III, Esq.

Nevada Bar No. 15110

jwaite@goldguylaw.com

2055 Village Center Circle

Las Vegas, Nevada 89134

Phone (702) 873-9500

Fax (702) 873-9600

Attorneys for Robert O. McMaster,

Special Administrator of the Estate of

Demetrios A. Dalacas

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ALLIED WORLD SPECIALTY INS.
CO., et al.

Plaintiffs,

v.

LISA M. LEE, as Special Administrator of
the Estate of Demetrios A. Dalacas, et al.,

Defendants.

CIVIL ACTION NO.: 2:21-CV-00078-JCM-EJY

**STIPULATION AND ~~[PROPOSED]~~ ORDER TO EXTEND TIME
(First Request)**

This Stipulation and [Proposed] Order to Extend Time, pursuant to Local Rule IA 6-1 (“Stipulation”), is made and entered into by Robert O. McMaster, as Special Administrator of the Estate of Demetrios A. Dalacas (“McMaster”) and Allied World Specialty Insurance Company f/k/a Darwin National Assurance Company and Allied World Insurance Company (“Plaintiff”). This is the first request for an extension of McMaster’s deadline to file a responsive pleading and/or answer. The purpose of this Stipulation is to extend the date for McMaster’s responsive pleading and/or answer to Plaintiff’s Complaint until April 9, 2021, for the following reasons:

1. McMaster was appointed as the Special Administrator of the Estate of Demetrios A. Dalacas on November 13, 2020, by order of the Probate Court, District Court, Clark County, Nevada in Case No. P-20-104354-E.

2. Unbeknownst to McMaster, a prior probate estate for Decedent Demetrios A. Dalacas, had already been opened in Case No. P-20-103708-E, whereby Lisa M. Lee ("Lee") was appointed Special Administrator by court order on October 16, 2020.

3. Subsequently, upon learning of the prior appointment of Lee, McMaster filed a Motion to Consolidate and to withdraw from further representation of the Dalacas Probate Estate (the "Motion to Consolidate and Withdraw").

4. A hearing on the Motion to Consolidate and Withdraw has been scheduled for April 2, 2021.

5. This Stipulation is necessary to allow the Probate Court to determine the proper party to defend or respond to the Complaint.

6. McMaster and Plaintiff have stipulated that McMaster's responsive pleading or answer will be due on April 9, 2021.

THEREFORE, IT IS SO STIPULATED AND AGREED that time for Robert O. McMaster to file an answer and/or responsive pleading shall be extended to April 9, 2021.

DATED this 17th day of February, 2021

GOLDSMITH & GUYMON, P.C.

/s/ John L. Waite III
John L. Waite III, Esq.
Nevada Bar No. 15110
2055 Village Center Circle
Las Vegas, Nevada 89134
Attorneys for Robert O. McMaster as
Special Administrator of the Estate of
Demetrios A. Dalacas

DATED this 17th day of February, 2021

**WILSON, ELSE, MOSKOWITZ, EDELMAN &
DICKER LLP**

IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

/s/ Chad C. Butterfield
Chad C. Butterfield, Esq.
Nevada Bar No. 10532
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, Nevada 89119
Attorneys for Plaintiff

Dated: February 18, 2021